

**United States District Court
Western District of Wisconsin**

Consumer Financial
Protection Bureau,

Plaintiff,

v.

The Mortgage Law Group, LLP, (d/b/a the
Law Firm of Macey, Aleman & Searns),
Consumer First Legal Group, LLC,
Thomas G. Macey, Jeffrey J. Aleman,
Jason E. Searns, and Harold E. Stafford,

Defendants.

Case No. 3:14-cv-00513

**PLAINTIFF'S MOTION FOR LEAVE TO FILE
AMENDED PROPOSED SPECIAL VERDICT**

The Bureau previously filed its proposed special verdict form on April 17, 2017, ECF No. 317. The proposed special verdict form included questions pertaining to potential civil money penalties for each defendant, which are based on the Consumer Financial Protection Act¹ and updated for inflation by regulation. The Bureau inadvertently used the incorrect civil money penalty figures in the original proposed special verdict. The amended version corrects those figures, but makes no other changes. The Defendants will therefore not be unfairly prejudiced by the amended filing. Although they have not consented to this motion, the Bureau shared a copy of the proposed amended special verdict with them before filing, and they did not indicate that they opposed it.

May 15, 2017

Respectfully submitted,

¹ 12 U.S.C. §

Consumer Financial Protection
Bureau

Anthony Alexis (DC Bar #384545)
Enforcement Director

David M. Rubenstein (DC Bar
#458770)
Deputy Enforcement Director

Cynthia Gooen Lesser (NY Bar
#2578045)
Assistant Deputy Enforcement Director

/s David Dudley
Seth B. Popkin, DC Bar #417365
seth.popkin@cfpb.gov
202-435-9496
Shirley Chiu, IL Bar #6296079
shirley.chiu@cfpb.gov
202-435-7592
Mary K. Warren, NY Bar #2557684
mary.warren@cfpb.gov
202-435-7815
David Dudley, WI Bar # 1062812
202-435-9284
david.dudley@cfpb.gov
Enforcement Attorneys
Consumer Financial Protection
Bureau
1700 G Street, NW
Washington, DC 20552

Certification

I certify that a copy of the Proposed Special Verdict was served on all counsel
of record on May 15, 2017 via the Court's electronic filing system.

/s David Dudley